



October 26, 2017

ATTN: TOM FARRELL  
BUCKEYE FARMS  
4991 458<sup>TH</sup> AVENUE  
PRESTON, IOWA 52069

SUBJECT: Animal Feeding Operation (AFO) Compliance Inspection for:  
- Buckeye Farms, County – Jackson, Facility #57426

Dear Mr. Farrell:

Attached is a copy of the report resulting from the Animal Feeding Operation (AFO) facility compliance inspection conducted on October 24, 2017.

Your attention is directed to the recommendations portion of the report.

If you have any questions, or feel this report does not represent the conditions at your facility, please call me at 563/927-2640.

The cooperation and assistance provided by you during the inspection is appreciated.

Sincerely,

Chris Gelner, Environmental Specialist  
[christopher.gelner@dnr.iowa.gov](mailto:christopher.gelner@dnr.iowa.gov)  
Field Services and Compliance Bureau

c: -Stephen Pollard, U.S. EPA Region 7, WWPD/WENF, 11201 Renner Blvd., Lenexa, KS 66219  
-Ken Hessenius, FO#3, AFO Enforcement Coordinator, Spencer, IA

enc: -AFO Facility Inspection Report  
-Animal Feeding Operation (AFO) Regulatory Status Form  
-Aerial Photos of Site

Efile: 49 AFO Preston 57426 Buckeye Farms 102417 Inspection csg

# IOWA DEPARTMENT OF NATURAL RESOURCES AFO INSPECTION REPORT

## FACILITY DESCRIPTION

<b>FACILITY LOCATION</b>	Facility: <b>Buckeye Farms</b>			Facility ID#: <b>57426</b>	
	Address: <b>4991 458<sup>th</sup> Avenue</b>		City: <b>Preston</b>	State: <b>IA</b>	Zip: <b>52069</b>
	PLSS: <b>Section 15, Van Buren Township (T84N, R05E), Jackson County</b>				
<b>OWNER</b>	Name: <b>Tom Farrell</b>				
	Address:		City:	State:	Zip:
<b>ANIMAL HOUSING TYPE</b>	<input type="checkbox"/> Confinement <input checked="" type="checkbox"/> Open Lot <input type="checkbox"/> Combined (Confinement & Open Lot)				
<b>ANIMAL INFORMATION</b>	Animal Type(s)	Capacity	Current Head	Number of Bldgs./Pens	
	<b>Cattle – Finish</b>	<b>700</b>	<b>625</b>	<b>6</b>	
	Date of Construction: <b>1982</b>		Dates of Expansion: <b>Several</b>		

## INSPECTION INFORMATION

<b>INSPECTION DATE</b>	This Inspection <b>10/24/2017</b>		Last Inspection: <b>01/04/2006</b>
<b>PERSONS INTERVIEWED</b>	Name: <b>Tom Farrell</b>		Title: <b>Facility Owner</b>
	Name:		Title:
<b>NEAREST WATERCOURSE</b>	Stream Name: <b>Copper Creek</b>		
	Description of Flow Path: <b>South about 830 ft to Copper Creek</b>		

## COMPLIANCE SUMMARY

<b>OBSERVATIONS</b>	Nutrient Management: <input type="checkbox"/> CNMP <input type="checkbox"/> NMP <input type="checkbox"/> MMP <input type="checkbox"/> Other <input checked="" type="checkbox"/> No formal plan		
	Manure Stockpiling:	Mortality Management:	Runoff from Feed Storage:
	<input checked="" type="checkbox"/> In controlled area <input type="checkbox"/> In compliance with rules <input type="checkbox"/> Not applicable – direct haul <input type="checkbox"/> Stockpiling in an uncontrolled area	<input checked="" type="checkbox"/> Rendering <input type="checkbox"/> Composting <input type="checkbox"/> Incineration <input type="checkbox"/> On-site burial <input type="checkbox"/> Landfill	<input type="checkbox"/> No outdoor feed storage area <input checked="" type="checkbox"/> Discharge from feedstock storage area is controlled <input type="checkbox"/> Feed storage is located in an uncontrolled area
	Clean Water Diverted:  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Discharge to a Water of the U.S. via Manmade Conveyance:  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Direct Animal Contact with Waters of the U.S.:  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Adjacent Facilities (by same owner/operator): <input type="checkbox"/> Confinement <input type="checkbox"/> Open Lot <input checked="" type="checkbox"/> None		
	Evidence of Discharges: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>NPDES PERMIT STATUS</b>	The facility, as observed during the inspection, was a Medium AFO and did not need an NPDES permit. NPDES permit is required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>COMPLIANCE STATUS</b>	This facility appeared to be in compliance with Iowa's environmental regulations at the time of the inspection. Actual conditions may vary over time with the operation and maintenance of the facility. Facility is in compliance: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

<b>AUTHENTICATION</b>	Inspector: <i>Chris Allen</i>	Date: <i>10/25/17</i>	Reviewer: <i>Ben Jorgensen</i>	Date: <i>10/26/17</i>
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**IOWA DEPARTMENT OF NATURAL RESOURCES**  
**AFO INSPECTION REPORT**

**FACILITY EVALUATION**

**Facility**

This facility consists of several concrete open feedlots housing a capacity of 700 beef cattle. Manure from the open feedlots is scraped and hauled to a stockpile in a field. Runoff from the open feedlots is directed into a series of concrete settling structures. Mortalities are disposed of by rendering. Mr. Tom Farrell, owner, was present and interviewed during the inspection.

**Nutrient Management Plan (NMP)**

No formal nutrient management plan has been developed. It is recommended that an NMP be developed to better account for manure production and usage.

**Clean Water Diversion**

Storm water diversions at the facility are lacking. Minimizing the amount of "clean" manure-free water that enters the feedlots can reduce the amount of runoff water that must be managed. It is recommended that "clean" water diversions be installed to reduce the amount of storm water that will be contaminated by manure or process wastewater. Some options are, roof gutters, drains, and compacted earth or concrete berms to direct "clean" water away from the feedlots. It is recommended that the facility be inspected following a rain event to determine flow patterns and to better understand what methods may be most cost effective and practical. No evidence of discharge to a water of the State was observed during the inspection. Runoff from the feedlots is settled in a series of concrete settling structures. After being settled, the remaining liquid flows through a tile for about 30 feet and into the road ditch. Mr. Farrell stated that he scrapes out solids from the road ditch on an annual basis. The ditch meets Copper Creek approximately 800 feet to the south. This area was observed and no discharge was observed and no evidence of past discharges or solid manure was observed.

**Manure Application**

Solid manure from the open feedlots is scraped on a regular basis and is hauled to a stockpile located in a field. The stockpile is located on a compacted rock base. In the event that manure cannot be hauled to the stockpile Mr. Farrell stages the solid manure in a concrete stacking facility at the bottom of the feedlots. As a reminder, all production waste from this facility including runoff that occurs following land application shall not cause a water quality violation. No evidence of discharge was observed during the inspection.

**Feedstuffs**

During the inspection it was noted that all feedstuffs are stored in concrete horizontal bunkers covered in plastic to reduce runoff and potential violations of state water quality standards. Be aware that feedstocks have potential to cause water quality violations and these areas should be monitored regularly for discharges. Paragraph 567 Iowa Administration Code 61.3(2) outlines general surface water quality criteria and requires that all surface waters be free from wastewater discharges or agricultural practices that produce stream conditions with objectionable color, odor or other aesthetically objectionable conditions. No evidence of discharge was observed during the inspection.

**Rendering**

Dead animals are disposed of by rendering at a common rendering site located at a neighbor's farm. This part of the operation should be inspected frequently as runoff water could carry leachate into a water of the state where it could create violations of state water quality standards. Discharge of such pollutants would potentially require a National Pollutant Discharge Elimination System (NPDES) permit.

**Bio-Security**

Prior to the inspection, bio-security was discussed with Mr. Farrell and it was agreed upon that DNR bio-security SOP would be followed. DNR bio-security SOP was followed during the inspection.

### **RECOMMENDATIONS**

- Regularly walk around the facility to monitor for discharges and needed repairs.
- Develop a nutrient management plan to better account for manure production and usage.
- Contact Iowa State Extension Ag Engineer, NRCS, or a private consultant to discuss potential risks and mitigation options for your farm. Contact information included.

### **SUMMARY**

- The facility, as observed, was considered a Medium AFO based on the capacity of animals at the animal feeding operation.
- No discharge was observed during the inspection and no evidence of past discharge was observed. No NPDES permit is required at this time.



## Animal Feeding Operation (AFO) Regulatory Status

Facility Name: Buckeye Farms Facility ID: 57426 County: Jackson

- ☐ Large CAFO – Discharging – NPDES Permit Required
- ☐ Large CAFO – No discharge – No NPDES Permit Required
- ☐ Large CAFO – Has NPDES Permit
- ☐ Medium CAFO – NPDES Permit Required
- ☒ Medium AFO – No NPDES Required
- ☐ Medium AFO – Has NPDES Permit
- ☐ Designated CAFO – NPDES Permit Required
- ☐ Small AFO – No NPDES Permit Required

This determination was made based on conditions and observations made at the time of the inspection on 10/24/2017. Please note that the regulatory status of the facility can change if conditions at the facility change or are different from those documented during the inspection.

Inspector: *Jim Blum* Date: 10/25/17

### Regulatory Definitions of Large CAFOs, Medium CAFOs, and Small CAFOs

These regulatory definitions are from the Code of Federal Regulations (CFR), implementing the federal Clean Water Act.

A **Large CAFO** confines at least the number of animals described in the table below.

A **Medium CAFO** falls within the size range in the table below and either:

- “(A) Pollutants are discharged into waters of the United States through a man-made ditch, flushing system, or other similar man-made device; or
- (B) Pollutants are discharged directly into waters of the United States which originate outside of and pass over, across, or through the facility or otherwise come into direct contact with the animals confined in the operation.” 40 CFR 122.23(b)(6)(ii)

If an operation is found to be a significant contributor of pollutants to waters of the United States, the permitting authority may designate a medium-sized facility as a CAFO as provided in 40 CFR 122.23(c).

A **Small CAFO** confines the number of animals listed in the table and has been designated as a CAFO by the permitting authority after determining that it is a significant contributor of pollutants to waters of the United States as provided in 40 CFR 122.23(c).

Animal Sector	Size Thresholds (number of animals)		
	Large CAFOs	Medium CAFOs	Small CAFOs
cattle or cow/calf pairs	1,000 or more	300 – 999	less than 300
mature dairy cattle	700 or more	200 – 699	less than 200
veal calves	1,000 or more	300 – 999	less than 300
swine (weighing over 55 pounds)	2,500 or more	750 – 2,499	less than 750
swine (weighing less than 55 pounds)	10,000 or more	3,000 – 9,999	less than 3,000
horses	500 or more	150 – 499	less than 150
sheep or lambs	10,000 or more	3,000 – 9,999	less than 3,000
turkeys	55,000 or more	16,500 – 54,999	less than 16,500
chickens other than laying hens (other than a liquid manure handling system)	125,000 or more	37,500 – 124,999	less than 37,500
laying hens (other than a liquid manure handling system)	82,000 or more	25,000 – 81,999	less than 25,000

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Facility ID# 57426

